

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:	:	
	:	Chapter 11
KATERRA INC., <i>et al.</i> ,	:	
	:	Case No. 21-31861 (DRJ)
	:	
Debtors.	:	(Jointly Administered)
	:	
KATERRA INC., by and through Daniel R.	:	
Williams, as Plan Administrator on behalf of	:	
Katerra Inc. and related debtors,	:	
	:	Adv. No. 23-03056 (DRJ)
Plaintiff,	:	
	:	
v.	:	
	:	
LAP SHUN HUI a/k/a JOHN HUI,	:	
	:	
Defendant.	:	
	:	

SECOND STIPULATION TO EXTEND TIME TO RESPOND TO THE COMPLAINT

WHEREAS, Plaintiffs Katerra Inc. and its affiliated debtors (“Plaintiffs”) filed their Complaint in this action on April 6, 2023 (Dkt. No. 1), and the Court issued a summons on April 7, 2023 (Dkt. No. 4);

WHEREAS, on May 8, 2023 the parties filed a *Stipulation to Extend Time Respond to the Complaint*, extending the deadline to June 6, 2023 [Docket no. 7];

WHEREAS, the parties have agreed to extend the time for Defendant to respond to the Complaint, through and including July 6, 2023;

IT IS HEREBY STIPULATED that the deadline for Defendant Lap Shun Hui a/k/a John Hui to move, answer, or otherwise respond to Plaintiffs’ Complaint (Dkt. No. 1) is extended through and including July 6, 2023.

Dated: May 31, 2023

Respectfully submitted,

<p><u>/s/ Trey A. Monsour</u> Trey A. Monsour, Esq. (Tex. Bar No. 14277200) David G. Crooks, Esq. (Tex. Bar No. 24028168) Adam T. Hamilton, Esq. (Tex. Bar No. 24087655) Fox Rothschild LLP Saint Ann Court 2501 North Harwood Street, Suite 1800 Dallas, TX 75201 Telephone: (214) 231-5796 Facsimile: (972) 404-0516 Mobile: (713) 927-7469 E-mail: tmonsour@foxrothschild.com E-mail: dcrooks@foxrothschild.com E-mail: ahamilton@foxrothschild.com</p> <p>-and-</p> <p>Michael A. Sweet (admitted <i>pro hac vice</i>) 345 California Street, Suite 2200 San Francisco, California 94104 Telephone: (415) 364-5540 Facsimile: (415) 391-4436 E-mail: msweet@foxrothschild.com</p> <p>-and-</p> <p>Gordon E. Gouveia (admitted <i>pro hac vice</i>) 321 North Clark Street, Suite 1600 Chicago, IL 60654 Telephone: (312) 980-3816 Facsimile: (312) 517-9201 E-mail: ggouveia@foxrothschild.com</p> <p>-and-</p> <p>Robert F. Elgidely (admitted <i>pro hac vice</i>) One Biscayne Tower 2 South Biscayne Boulevard, Suite 2750 Miami, FL 33131 Telephone: (305) 442-6543 Facsimile: (305) 442-6541 E-mail: relgidely@foxrothschild.com</p> <p><i>Counsel to the Plan Administrator</i></p>	<p><u>/s/ Michael D. Warner</u> Michael D. Warner (TX Bar No. 00792304) Benjamin L. Wallen (TX Bar No. 24102623) PACHULSKI STANG ZIEHL & JONES, LLP 440 Louisiana Street, Suite 900 Houston, TX 77002 Telephone: (713) 691-9385 Facsimile: (713) 691-9407 Email: mwarner@pszjlaw.com bwallen@pszjlaw.com</p> <p>-and-</p> <p>Robert Platt (<i>pro hac vice</i> forthcoming) Carl Grumer (<i>pro hac vice</i> pending) MANATT, PHELPS & PHILLIPS, LLP 2049 Century Park East, Suite 1700 Los Angeles, CA 90067 Telephone: (310) 312-4221 Facsimile: (310) 914-5804 E-mail: rplatt@manatt.com E-mail: cgrumer@manatt.com</p> <p>-and-</p> <p>Joshua Drian (<i>pro hac vice</i> forthcoming) MANATT, PHELPS & PHILLIPS, LLP 1050 Connecticut Ave. NW, Suite 600 Washington, DC 20036 Telephone: (202) 585-6625 Facsimile: (202) 637-1510 E-mail: jdrian@manatt.com</p> <p>-and-</p> <p>Ronald M. Dorfman (<i>pro hac vice</i> forthcoming) Joseph N. Dorfman (<i>pro hac vice</i> forthcoming) THE DORFMAN LAW FIRM 1641 20th St. Santa Monica, California 90404 Telephone: (310) 266-0683 E-mail: ron@dorfmanlawfirm.com E-mail: joseph@dorfmanlawfirm.com</p> <p><i>Counsel for Lap Shun Hui a/k/a John Hui</i></p>
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CERTIFICATE OF SERVICE

I hereby certify that on this 31st day of May, 2023, a true and correct copy of the above and foregoing was caused to be served through this Court's CM/ECF noticing system to all parties registered to receive notices in this case.

/s/ Michael D. Warner
Michael D. Warner, Esq.